



TAGLaw International Lawyers

Benjamin LaFrombois, Esq.
Direct Telephone
920-233-4704
blafrombois@vonbriesen.com

May 22, 2020

VIA ECF FILING

Hon. Lewis J. Liman
United States District Court Judge
Southern District of New York

Re: Convergen Energy, et al. v. Steven J. Brooks, et al.,
Case No. 20-cv-3746 (LJL)

Dear Judge Liman:

Pursuant to the Court's direction, the parties have been engaging in lengthy and technically in-depth meet and confer sessions. At this point, the parties are cautiously optimistic that they can resolve most, if not all, of the issues raised by Plaintiffs' preliminary injunction motion, without the need for further formal proceedings.

The parties agree that they need additional time to continue to work through the issues involved. To facilitate those continued discussions, the parties request that all dates in the schedule set by the Court's May 22 Order be suspended by one week. The parties agree to update the Court as to their progress by Friday, May 29, 2020 at 5:00 p.m. Eastern Time. The parties expect that they would then be able to inform the Court whether there are any issues that still need to be addressed on preliminary injunction. If there are any further issues that require Court resolution, the parties would then proceed on the schedule indicated by the Court.

I am authorized to state that Attorneys Ryan Billings and Michael Stolper have reviewed and agree with this letter.

Very truly yours,

von BRIESEN & ROPER, s.c.

A handwritten signature in black ink, appearing to read "BLF", with a long horizontal stroke extending to the right.

Benjamin LaFrombois, Esq.

BDL:sf
Enc.

cc: Counsel of Record via ECF

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